

SUPPRESSED

NOV 18 2020
U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

DAMON CAMPBELL,
BRIDGET JONES,
APRIL TIBBS, and
JAMES REED,

Defendants.

4:20CR732 SRC/DDN

INDICTMENT

The Grand Jury Charges:

BACKGROUND

At all times relevant to the Indictment:

1. Damon Campbell, Bridget Jones, April Tibbs, and James Reed all resided in the Eastern District of Missouri.
2. From approximately September of 2020, to present, the Defendants have been using the means of identification of different individuals in order to apply for lines of credit and vehicle loans.

3. In addition to using others' means of identification, the Defendants have been using fraudulent Drivers Licenses and Social Security cards, purportedly issued by the appropriate State and Federal agencies, in order to apply for the lines of credit and vehicle loans.

4. In multiple transactions and attempted transactions, Defendant Damon Campbell falsely represented himself as victims T.D. and W.W.

5. In multiple transactions and attempted transactions, Defendant Bridget Jones falsely represented herself as victim R.M.

6. In multiple transactions and attempted transactions, Defendant April Tibbs falsely represented herself as victim K.R.

7. In multiple transactions and attempted transactions, Defendant James Reed falsely represented himself as victim B.C.

COUNTS 1 THROUGH 4

42 U.S.C. § 408(a)(7)(B): Misuse of Social Security Number

On or about the dates listed below, within the Eastern District of Missouri, the defendant,

DAMON CAMPBELL,

with the intent to deceive, and for the purpose of obtaining anything of value from another person and for any other purpose, falsely and fraudulently represented his Social Security Number to be one of the Social Security Numbers as enumerated below, when in fact this Social Security Number was assigned to victims T.D. or W.W., the aliases used by Defendant **DAMON CAMPBELL:**

COUNT	DATE	DEALERSHIP/CREDITOR	SSN USED
1	9/4/2020	Rock Road/Capital One	***-**-7782

2	9/14/2020	Johnny Londoff/Exeter Finance	***-**-7782
3	9/17/2020	Glendale Chrysler/Ally Bank	***-**-7113
4	9/18/2020	Hollywood Motor Company	***-**-7113

All in violation of Title 42, United States Code, Section 408(a)(7)(B).

COUNTS 5 THROUGH 8
18 U.S.C. § 1344: Bank Fraud

On or about the dates listed below, within the Eastern District of Missouri, the defendant,

DAMON CAMPBELL,

did knowingly and willfully execute and attempt to execute a scheme or artifice to defraud and to obtain the moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of the financial institutions listed below, which were financial institutions as defined in 18 U.S.C. § 20, by means of materially false and fraudulent pretenses, representations, and promises, to wit: by completing and causing to be completed applications for loans and lines of credit from the below named motor vehicle dealerships and creditors, stating and representing that **DAMON CAMPBELL** was victim T.D. or victim W.W.:

COUNT	DATE	DEALERSHIP/CREDITOR	SSN USED
5	9/4/2020	Rock Road/Capital One	***-**-7782
6	9/14/2020	Johnny Londoff/Exeter Finance	***-**-7782
7	9/17/2020	Glendale Chrysler/Ally Bank	***-**-7113
8	9/18/2020	Hollywood Motor Company	***-**-7113

All in violation of Title 18, United States Code, Section 1344.

COUNT 9

18 U.S.C. §1028A: Aggravated Identity Theft

Between on or about September 1, 2020, and September 30, 2020, within the Eastern District of Missouri, the defendant,

DAMON CAMPBELL,

did knowingly possess, transfer, and use, without lawful authority, a means of identification of another person, to wit, the Social Security Number of T.D., during and in relation to the commission of the felony offense of bank fraud, Title 18, United States Code, Section 1344.

In violation of Title 18, United States Code, Section 1028A.

COUNT 10

18 U.S.C. §1028A: Aggravated Identity Theft

Between on or about September 1, 2020, and September 30, 2020, within the Eastern District of Missouri, the defendant,

DAMON CAMPBELL,

did knowingly possess, transfer, and use, without lawful authority, a means of identification of another person, to wit, the Social Security Number of W.W., during and in relation to the commission of the felony offense of bank fraud, Title 18, United States Code, Section 1344.

In violation of Title 18, United States Code, Section 1028A.

COUNTS 11 AND 12

42 U.S.C. § 408(a)(7)(B): Misuse of Social Security Number

On or about the dates listed below, within the Eastern District of Missouri, the defendant,

BRIDGET JONES,

with the intent to deceive, and for the purpose of obtaining anything of value from another person and for any other purpose, falsely and fraudulently represented her Social Security Number to be the Social Security Number enumerated below, when in fact this Social Security Number was assigned to victim R.M., the alias used by Defendant **BRIDGET JONES**:

COUNT	DATE	DEALERSHIP/CREDITOR	SSN USED
11	9/23/2020	Macy's/Citi Bank	***-**-9627
12	9/24/2020	Dean Team Automotive/Wells Fargo	***-**-9627

All in violation of Title 42, United States Code, Section 408(a)(7)(B).

COUNTS 13 AND 14
18 U.S.C. § 1344: Bank Fraud

On or about the dates listed below, within the Eastern District of Missouri, the defendant,

BRIDGET JONES,

did knowingly and willfully execute and attempt to execute a scheme or artifice to defraud and to obtain the moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of the financial institutions listed below, which were financial institutions as defined in 18 U.S.C. § 20, by means of materially false and fraudulent pretenses, representations, and promises, to wit: by completing and causing to be completed applications for loans and lines of credit from the below named retail store and motor vehicle dealership by completing and causing to be completed applications for loans and lines of credit from the below named retail

store and motor vehicle dealership and creditors, stating and representing that **BRIDGET JONES** was victim R.M.:

COUNT	DATE	DEALERSHIP/CREDITOR	SSN USED
13	9/23/2020	Macy's/Citi Bank	***-**-9627
14	9/24/2020	Dean Team Automotive/Wells Fargo	***-**-9627

All in violation of Title 18, United States Code, Section 1344.

COUNT 15

18 U.S.C. § 1028A: Aggravated Identity Theft

Between on or about September 1, 2020, and September 30, 2020, within the Eastern District of Missouri, the defendant,

BRIDGET JONES,

did knowingly possess, transfer, and use, without lawful authority, a means of identification of another person, to wit, the Social Security Number of R.M., during and in relation to the commission of the felony offense of bank fraud, Title 18, United States Code, Section 1344.

In violation of Title 18, United States Code, Section 1028A.

COUNT 16

42 U.S.C. § 408(a)(7)(B): Misuse of Social Security Number

On or about the dates listed below, within the Eastern District of Missouri, the defendant,

APRIL TIBBS,

with the intent to deceive, and for the purpose of obtaining anything of value from another person and for any other purpose, falsely and fraudulently represented her Social Security Number to be

the Social Security Number enumerated below, when in fact this Social Security Number was assigned to victim K.R., the alias used by Defendant **APRIL TIBBS**:

COUNT	DATE	DEALERSHIP/CREDITOR	SSN USED
16	9/30/2020	Dean Team Automotive/Fifth Third Bank	***-**-0221

In violation of Title 42, United States Code, Section 408(a)(7)(B).

COUNT 17
18 U.S.C. § 1344: Bank Fraud

On or about the dates listed below, within the Eastern District of Missouri, the defendant,

APRIL TIBBS,

did knowingly and willfully execute and attempt to execute a scheme or artifice to defraud and to obtain the moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of the financial institution listed below, which is a financial institution as defined in 18 U.S.C. § 20, by means of materially false and fraudulent pretenses, representations, and promises, to wit: by completing and causing to be completed applications for loans and lines of credit from the below named motor vehicle dealerships and creditors, stating and representing that **APRIL TIBBS** was victim K.R.:

COUNT	DATE	DEALERSHIP/CREDITOR	SSN USED
17	9/30/2020	Dean Team Automotive/Fifth Third Bank	***-**-0221

In violation of Title 18, United States Code, Section 1344.

COUNT 18

18 U.S.C. §1028A: Aggravated Identity Theft

On or about September 30, 2020, within the Eastern District of Missouri, the defendant,

APRIL TIBBS,

did knowingly possess, transfer, and use, without lawful authority, a means of identification of another person, to wit, the Social Security Number of K.R., during and in relation to the commission of the felony offense of bank fraud, Title 18, United States Code, Section 1344.

In violation of Title 18, United States Code, Section 1028A.

COUNT 19

42 U.S.C. § 408(a)(7)(B): Misuse of Social Security Number

On or about the dates listed below, within the Eastern District of Missouri, the defendant,

JAMES REED,

with the intent to deceive, and for the purpose of obtaining anything of value from another person and for any other purpose, falsely and fraudulently represented his Social Security Number to be the Social Security Number enumerated below, when in fact this Social Security Number was assigned to victim B.C., the alias used by Defendant **JAMES REED**:

COUNT	DATE	DEALERSHIP/CREDITOR	SSN USED
19	9/29/2020	All Star Dodge/Together Credit Union	***-**-5335

In violation of Title 42, United States Code, Section 408(a)(7)(B).

COUNT 20

18 U.S.C. § 1344: Bank Fraud

On or about the dates listed below, within the Eastern District of Missouri, the defendant,

JAMES REED,

did knowingly and willfully execute and attempt to execute a scheme or artifice to defraud and to obtain the moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of the financial institution listed below, which is a financial institution as defined in 18 U.S.C. § 20, by means of materially false and fraudulent pretenses, representations, and promises, to wit: by completing and causing to be completed applications for loans and lines of credit from the below named motor vehicle dealerships and creditors, stating and representing that **JAMES REED** was victim B.C.:

COUNT	DATE	DEALERSHIP/CREDITOR	SSN USED
20	9/29/2020	All Star Dodge/Together Credit Union	***-**-5335

In violation of Title 18, United States Code, Section 1344.

COUNT 21**18 U.S.C. § 1028A: Aggravated Identity Theft**

On or about September 29, 2020, within the Eastern District of Missouri, the defendant,

JAMES REED,

did knowingly possess, transfer, and use, without lawful authority, a means of identification of another person, to wit, the Social Security Number of B.C., during and in relation to the commission of the felony offense of bank fraud, Title 18, United States Code, Section 1344.

In violation of Title 18, United States Code, Section 1028A.

FORFEITURE ALLEGATION

The Grand Jury further finds by probable cause that:

1. Pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and Title 28, United States Code, Section 2461, upon conviction of an offense in violation of Title 18, United States Code, Section 641 as set forth in Counts I and VI, the defendant shall forfeit to the United States of America any property, real or personal, which constitutes or is derived from proceeds traceable to said violation.

2. Subject to forfeiture is a sum of money equal to the total value of any property, real or personal, constituting or derived from any proceeds traceable to said offense.

3. Pursuant to Title 18, United States Code, Sections 982(a), upon conviction of an offense in violation of Title 18, United States Code, Section 666(a)(1) as set forth in Counts III and IV, the defendant shall forfeit to the United States of America any property constituting, or derived from, any proceeds obtained directly or indirectly, as the result of such violation.

4. Subject to forfeiture is a sum of money equal to the total value of any property, real or personal, constituting or derived from any proceeds traceable to said violation.

5. Pursuant to Title 18, United States Code, Sections 982(a), upon conviction of an offense in violation of Title 18, United States Code, Section 1001 as set forth in Counts V and VIII, the defendant shall forfeit to the United States of America any property constituting, or derived from, any proceeds obtained directly or indirectly, as the result of such violation.

6. Subject to forfeiture is a sum of money equal to the total value of any property, real or personal, constituting or derived from any proceeds traceable to said violation.

7. If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America will be entitled to the forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

A TRUE BILL.

FOREPERSON

JEFFREY B. JENSEN,
United States Attorney

DIANE E.H. KLOCKE, #61670MO
Special Assistant United States Attorney